

6/16/09 Bd Mtg.

Item 8

ARRA

Deadline: 6/10/09 by 12 noon

From: Kirsten Liske <kliske@ecoact.org>
 To: <commentletters@waterboards.ca.gov>
 CC: Karen Christensen <kchristensen@rcdsantacruz.org>, Angie Stuart <astuart...
 Date: Tuesday, June 09, 2009 3:45 PM
 Subject: Comment Letter - ARRA Subsidy

9 June 2009

Ms. Jeanine Townsend, Clerk to the Board
 State Water Resources Control Board
 1001 1/2 Street, 24th Floor
 Sacramento, CA 95814
 commentletters@waterboards.ca.gov

r.e. ARRA Subsidy Fund for CWSRF Projects: SWRCB June 16, 2009 Meeting

Hello and good day,

Thank you for considering the most appropriate use of ARRA and SWRCB funds to support economic recovery and watershed protection during this challenging time.

We offer the following comments on the above referenced item in response to the Discussion provided by the SWRCB staff in relation to the said item.

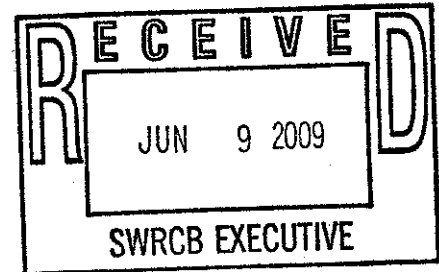
1. Prioritize "Awarded not Contracted" projects at the highest level.
 The Board has already prioritized stopped projects and we believe Awarded not Contracted projects should be given similar priority. The Awarded not Contracted projects were thoroughly vetted through competitive grant selection processes but had not finalized/signed contracts before the stop work freeze December 18, 2008. In our case, one project was awarded over one year ago by your Board in May 2008, but was not contracted due to delays in negotiations between the state and regional board. The State made a commitment to support these projects that it has not upheld due to funding challenges. Awarded not Contracted projects that also meet ARRA requirements and priorities should be given a top priority for funding, regardless of project category, and allow the SWRCB to move forward in good faith on its past investments and commitments.

1. Do not pre-select Urban Stormwater projects for priority in funding Expanded Use Projects.
 The staff recommendation in the discussion is to prioritize urban stormwater projects in Disadvantaged Communities (Option 2C in the Discussion). Several points of logic lead to our recommendation:
 > 1. The analysis that staff utilize here does not comprehensively assess funding for all NPS activities from various funding sources throughout California, nor consider impact, pollutant load reduction, watershed plan prioritization or other important consideration.
 > 2. This is not a stated priority within ARRA funding, while job creation (unemployment rate) and job creation (construction start date) are.
 > 3. This pre-selected preference was not visible during the application period over the past months.

1. Given the above, we recommend the following prioritization for funding decisions under the CWSRF:
 > 1. Awarded not Contracted Projects - highest priority over any other categorization
 > 2. then consider New Expanded Use and DAC project applications:
 i. Expanded Use Criteria:
 1. High Unemployment Rate and Construction Start date (Option 2D in discussion)
 2. Application completion date

Thank you for considering our comments. If you have any questions or comments, please do not hesitate to contact me at (831) 426-5925 ext 123.

Sincere Regards,



Kirsten Liske
Vice President, Ecology Action

cc:

Kellyx Nelson, Executive Director, San Mateo Resource Conservation District
DJ Funk, District Manager, Upper Salinas- Las Tablas Conservation District
Deb Barker, Program Manager, Coastal San Luis Obispo Resource Conservation District
Tom Lockhart, District Manager, Cachuma Resource Conservation District
Paul Robbins, Executive Director, Monterey County Resource Conservation District
Karen Christensen, Santa Cruz County Resource Conservation District

Ecology Action of Santa Cruz
Achieving Community and Environmental Excellence through Partnership and Innovation

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organizations and events in Santa Cruz County.